

**MAY 3 1 2005**

# TRANSMITTAL OF APPEAL BRIEF (Large Entity)

Docket No.  
END920010075US1

Re Application Of: **Leonard E. Frey et al**

Application No. 10/040,799	Filing Date 01/07/2002	Examiner Srirama T. Channavajjala	Customer No. 26502	Group Art Unit 2164	Confirmation No. 2893
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Invention: **TRANSACTION METHOD AND SYSTEM**

COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on 03/29/05

The fee for filing this Appeal Brief is: **\$500.00**

- ☐ A check in the amount of the fee is enclosed.
- ☒ The Director has already been authorized to charge fees in this application to a Deposit Account.
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*John Cronley*  
Signature

Dated: 05/27/05

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I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on

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cc: **Records**



Docket No.: END920010075US1

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In Re Patent Application of: Leonard E. Frey et al.

Group Art Unit: 2164 : IBM Corporation  
Examiner: Srirama T. Channavajjala : Intellectual Property Law  
Serial No.: 10/040,799 : Department IQ0A/040-3  
Filed: 01/07/2002 : 1701 North Street  
Title: TRANSACTION METHOD : Endicott, New York 13760  
AND SYSTEM

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*Georgia V. Brundege* 5/27/05  
Georgia V. Brundege Date

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

**APPEAL BRIEF**

Appellants hereby appeal from the Final Action of 01/04/2005 and the Advisory Action of 03/21/2005, and offer the following arguments in support thereof.

**(i) REAL PARTY IN INTEREST**

The real party in interest is International Business Machines Corporation, a corporation of New York, with a place of business at Armonk, NY 10504

**(ii) RELATED APPEALS AND INTERFERENCES**

There are no related appeals or interferences with which the undersigned is aware.

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**(iii) STATUS OF CLAIMS**

Claims 1 - 2, 4, 6 - 9, 13 - 16, and 18 - 19 are pending in the present application. Claims 1 - 2, 4, 6 - 9, 13 - 16, and 18 - 19 have all been finally rejected and are the subject matter of this appeal.

**(iv) STATUS OF AMENDMENTS**

An amendment to the Final Action of 01/04/2005 was filed 03/07/2005. The Examiner's Advisory Action of 03/21/2005 maintains the final rejection and the amendment is not entered.

**(v) SUMMARY OF CLAIMED SUBJECT MATTER**

Appellants' invention relates to a unique system, method, and computer program product for processing transactions between interconnected processing databases when the processing databases are of a different type. Each of the processing databases includes an agent for processing transactions involving data within the respective database. An intermediary database known as a transaction database is provided. One or more transactions, each having a key and a detail, are written from a first processing database to the transaction database. The key specifies which document in a processing database is affected by the transaction. The detail specifies what action to take, e.g. update, with the document specified by the key.

The agent in a second processing database of a different type, periodically searches the transaction database for a key and detail to determine whether the agent should process a transaction. The agent uses such key and detail to update a

record in the second processing database.

**(vi) GROUND OF REJECTION**

There is only one ground of rejection. All of the pending claims, claims 1 - 2, 4, 6 - 9, 11, 13 - 16, and 18 - 19 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Draper et al. (US Patent 6,192,365) in view of Chandrasekaran, et al. (US Patent 6,738,971). The issue is whether Draper when taken with Chandrasekaran disclose all of the features of Appellants' claims 1 - 2, 4, 6 - 9, 11, 13 - 16, and 18 - 19.

**(vii) ARGUMENT**

Appellants' independent claims 1, 8, and 15 are finally rejected by the Examiner under 35 U.S.C. 103(a) as being unpatentable over Draper in view of Chandrasekaran. The Examiner's position is that Draper teaches all of the elements of Appellants' claims 1, 8, and 15 except 'databases of a plurality of types' and 'said second of said plurality of databases having a different type than said first of said plurality of databases.' The Examiner then states that Chandrasekaran specifically teaches 'databases of a plurality of types' in his fig. 2, elements 110, 112; and 'said second of said plurality of databases having a different type than said first of said plurality of databases' in column 2, line 10 - 17, column 3, line 65 - 67, column 4, line 1, because one database system may be an IBM DB2 database while another may be an ORACLE database (column 2, line 10 - 17).

Appellants submit that no such databases of a plurality of types nor a second of said plurality of databases having a different type than said first of said plurality of databases are

described or suggested by Chandrasekaran.

Chandrasekaran notes in his column 2, lines 14 - 17, that his database system 104 may be an Oracle database server system while database system 106 may be an IBM database server system such as DB2. However, Applicants use of the term type of database is clearly defined in their Specification page 7, lines 3 - 9. Appellants furthermore list the types of databases to include a relational database, a messaging database, a sequential database, a spreadsheet database, or a Lotus Notes database. Furthermore, Appellants give on line 5 and 6, as examples of the relational database type a DB2 database or ORACLE database. Thus it is clear that under Appellants definition of the term type of database, DB2 and ORACLE are both relational type databases. These are not databases having a different type as required by Appellants' independent Claims 1, 8, and 15. Chandrasekaran therefore does not describe or suggest with his example of Oracle and DB2, this important feature of databases having a different type.

Nor does Chandrasekaran describe or suggest in any of the other portions cited by the Examiner (as listed above), the databases of a plurality of types and a second of said plurality of databases having a different type than said first of said plurality of databases as required by Appellants' independent claims 1, 8, and 15.

All of Appellants' other pending claims depend directly or indirectly on these independent claims and therefore also require these features.

Clearly neither Draper nor Chandrasekaran separately

describe or suggest Appellants' claimed invention. Furthermore, there is no suggestion in either document on how either can be modified or combined to provide Appellants' claimed invention.

Appellants' position therefore is that rejection of the pending claims is in error and must be withdrawn. All of the claims are allowable.

In view of the above, it is respectfully requested that the Board reverse the Examiner's final rejection of all of the claims on appeal and allow these claims.

Respectfully submitted,

Dated: 05/27/05

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**(viii) CLAIMS APPENDIX**

1. (currently amended) A method of processing transactions, comprising the steps of:

providing a plurality of processing databases of a plurality of types each having a respective agent;

providing a transaction database;

writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction database for a key and detail to determine whether said processing agent should process said one or more transactions; and

updating a record in said second of said plurality of processing databases, by using said key and detail.

2. (original) The method of claim 1, wherein said transaction database is a messaging database.

3. (original) The method of claim 1, wherein said transaction database is a LOTUS NOTES database and said plurality of processing databases are adapted to read said LOTUS NOTES database.

4. (original) The method of claim 1, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

5. (original) The method of claim 1, wherein said key includes a wildcard character.

6. (original) The method of claim 1, further comprising the step of transferring said one or more transactions from said transaction database to said second of said plurality of processing databases prior to said step of updating a record.

7. (original) The method of claim 1, further comprising the step of setting a status flag in said one or more transactions.

8. (currently amended) A system for processing transactions, comprising:

a plurality of processing databases of a plurality of types each having a respective agent;

a transaction database;

means for writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

means for periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction



database for a key and detail to determine whether said processing agent should process said one or more transactions; and

means for updating a record in said second of said plurality of processing databases, by using said key and detail.

9. (original) The system of claim 8, wherein said transaction database is a messaging database.

10. (original) The system of claim 8, wherein said transaction database is a LOTUS NOTES database and said plurality of processing databases are adapted to read said LOTUS NOTES database.

11. (original) The system of claim 8, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

12. (original) The system of claim 8, wherein said key includes a wildcard character.

13. (original) The system of claim 8, further comprising means for transferring said one or more transactions from said transaction database to said second of said plurality of processing databases.

14. (original) The system of claim 8, wherein said one or more transactions have a status flag.

15. (currently amended) A computer program product for instructing a computer processor to handle transactions, said computer program product comprising:

a computer readable medium;

first program instruction means for providing a plurality of processing databases of a plurality of types each having a respective agent;

second program instruction means for providing a transaction database;

third program instruction means for writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

fourth program instruction means for periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction database for a key and detail to determine whether said processing agent should process said one or more transactions; and

fifth program instruction means for updating a record in said second of said plurality of processing databases, by using said key and detail; and wherein

all said program instruction means are recorded on said medium.

16. (original) The computer program product of claim 15, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

17. (original) The computer program product of claim 15, wherein said key includes a wildcard character.

18. (original) The computer program product of claim 15, further comprising sixth program instruction means for transferring said one or more transactions from said transaction database to said second of said plurality of processing databases.

19. (original) The computer program method of claim 15, further comprising sixth program instruction means for setting a status flag in said one or more transactions.